(EHR) Incentive News

TENNCARE EHR PROVIDER INCENTIVE PAYMENT PROGRAM
A CMS "PROMOTING INTEROPERABILITY" PROGRAM

Reminders:

Information you may still need — all the latest updates — can still be found on the TennCare EHR Incentive website.

Only accepting resubmissions of Program Year 2021 attestations that have been corrected as specified. November 15 is the final date corrected attestations will be accepted.

Can We Help?

If you have questions about the EHR Incentive Program as it begins to wrap upnow that it is ending, contact us Monday through Friday from 7:00 a.m. to 3:30 p.m. Central Time. When emailing, please include your provider's name(s) and NPI(s).

Don't Delay! Return Corrected Attestations Right Away!

Check your Program Year 2021 attestation status — was your attestation approved and forwarded for payment? Or was it returned to you for correction?

As of this writing, there are still several attestations that were returned for correcting that have yet to be resubmitted. Just as there was a deadline for the submission of your attestation, there is also a deadline for resubmitting corrections: **November 15**!

When TennCare reviews EHR attestations there are typically some with errors that are returned for correction. Some errors occur in the "eligibility" section (the first four pages). Other errors may be found in the Meaningful Use (MU) attestation section. Some errors may be in both sections, so if your attestation was returned for eligibility corrections, we must still review your MU section. Therefore we need your resubmitted attestation right away in case it must be returned for MU corrections!

While many attestations are quickly resubmitted, some are not. In fact, some providers' offices seem to forget to check on the status of their attestations (see page 2).

Delayed SRAs must be completed by Dec. 31, 2022

Many providers chose to delay completing their 2021 Security Risk Analysis (SRA) until after attesting, as allowed by CMS for this year. Those who chose to do so now **must complete** the annual SRA by Dec. 31, 2021. If you did attest that your SRA will be completed by Dec. 31, 2021, failure to submit your SRA by Jan. 31, 2022 to TennCare Audit at InternalAudit.TennCare@tn.gov **will** result in a post-payment audit of your 2021 attestation.

See page 3 in this issue should you need to review requirements for completing your SRA.

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Do You Have Questions Remaining About

The EHR Incentive Program?

Past attestations?

Your Future with Electronic Heath Records?

Email TennCare. EHRIncentive @tn.gov

Always include the Provider's Name and NPI when communicating with TennCare.

Attestation Correction Help — As Close as Your Return Letter

Whenever an attestation is returned for correction, a return letter is also sent to your email address of record. These letters explain what needs to be corrected on the attestation and how the correction can be made.

Too many times we hear that a provider's office ignores or simply forgets to look for these return letters. Sometimes an office may fail to update their contact email address and their letter is sent to Internet limbo. (To update your contact email address, see page 4.) Each year there are some attestations that are denied because the provider never returns to make corrections before the correction cutoff date.

Sometimes we see that a provider has corrected problems, but they fail to return the attestation to us. This is covered in the return email, but as a reminder:

√ Once you have made the correction(s) required

√ Open **EACH** page of the attestation

√ Click "OK" at the bottom of each page

√ At the end, click "Submit"

Failure to do this will result in your attestation not being returned to us for further processing. We cannot "pull" your attestation back in; you must send it to us.

If we return your attestation for any reason(s) involving the first four

pages and you don't understand the return reason, email us **immediately** at TennCare.EHRIncentive@tn.gov. We will explain further what is needed for your attestation. We **MUST** complete this portion of the review by **November 15** this year or we will have to **deny** your attestation.

After your eligibility has been approved, your MU and eCQM pages must be reviewed and approved before we make the EHR Incentive Payment. Eligibility is reviewed first, then MU/eCQM data is reviewed as a separate section. Should you need corrections, a separate letter is sent for each section.

I Don't Recall a Letter... How Can I Know if I Have Corrections to Make?

√ If you've already received your 2021 EHR Incentive payment, or if you have been told you are approved for a 2021 payment, *you have no corrections to make.*

√ If you missed or deleted your letter, check your attestation status by logging into your account, and scroll to the bottom of your dashboard. There you will see the words "Current Status". If that's followed by "**Eligibility Attestation Returned**" or "**Meaningful Use Attestation Returned**", *then you have an attestation to correct and return*!

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Delayed Your 2021 Security Risk Analysis? Here's Info You Need to Complete & Submit

Did you exercise the CMS option to delay completing your 2021 Security Risk Analysis (SRA) when submitting your attestation? If so, don't forget you now must complete the annual SRA by **Dec. 31, 2021**.

If your SRA has yet to be hammered into a final form, here are some points to keep in mind and some information that must be included.

In order to meet Meaningful Use (MU) Requirements, a security risk analysis (SRA) must be conducted or reviewed for each year of participation in the TennCare EHR Provider Incentive Payment Program (PIPP). While there are numerous methods of performing a security risk analysis, there is no single method or "best practice" that guarantees compliance with the Security Rule. The method and format used to document the requirements are up to the individual practice.

The MU objective for the SRA is to "Protect electronic protected health information (ePHI) created or maintained by the certified EHR technology (CEHRT) through the implementation of appropriate technical capabilities." To meet the measure, the eligible provider must conduct or review the SRA in accordance with the requirements under 45 CFR 164.308(a)(1), including:

- Addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and

- Implement security updates as necessary, and

- Correct identified security deficiencies as

part of the eligible professional's (EP's) risk management process.

The SRA must also answer the following questions:

- Who completed the SRA?

- Was an inventory list prepared of all hardware and software that creates, receives, maintains or transmits Electronic Personal Health Information (EPHI)?

- Has a final report and/or corrective action plan(s) been documented for all significant deficiencies noted during the SRA, including target dates for implementation?

The SRA must be maintained in a folder with all proper documentation, including an inventory list and a final report.

Your promised SRA must then be submitted by **Jan. 31, 2022** to TennCare Audit at InternalAudit.TennCare@tn.gov. Failure to submit a promised SRA will result in a post-payment audit.

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TDH Offers Provider 'Thank You'

In 2011 the Tennessee Department of Health (TDH) began assisting eligible professionals and eligible hospitals in their attempts to attest to the Centers for Medicare and Medicaid Services (CMS) EHR Incentive Payment program requirements.

Initially, TDH made available the Immunization Registry, Electronic Lab Reporting (ELR), and Tennessee Cancer Registry. Over time, Syndromic Surveillance and Electronic Case Reporting (eCR) were added as options for participants to report electronically and to receive attestation support using the Trading Partner Registration (TPR) system.

Thanks to eligible professionals and eligible hospitals participating in the EHR Provider Incentive Payment Program, public health reporting has seen a significant increase in electronic reporting, making actionable data more readily available for public health action and response, while reducing burden associated with manual reporting.

Certified EHR technology has also helped to eliminate the need for manual data entry, faxing, providing timely and complete data to public health. Also, public health programs can use the data from EHRs for disease tracking, case

management, and contact tracing. CMS made the use of Certified EHR Technology a requirement that has benefited both public health and health care providers using the most up-to-date standards and functions to better support interoperable data exchange and improve clinical workflows.

TennCare's EHR Incentive Program will end Dec. 31, 2021 but TDH will continue to work with electronic partners to reduce provider reporting burdens and to support electronic health information exchange to communicate public health data electronically.

We are grateful to all our existing and future partners who have worked diligently to interface their EHR with one or multiple TDH program systems. TDH trading partners also fulfill their state disease and case reporting legal requirements with electronic interfaces that are often automated once implemented by their EHR vendor.

Thank you to all participating EHR Incentive Payment program partners who have shared EHR data so TDH can continue to collect health information to prevent and contain outbreaks, analyze population health trends, inform prevention and mitigation measures, track immunization rates, and track infectious diseases.

If you would like to learn more about any of the of the interfaces listed above or would like to know your organization's status, please contact our Partner Engagement team at MU.Health@tn.gov.

How to Update Your Email Address

Update your email address to ensure you receive all remaining EHR program communication:

- Go to https://ehrincentives.cms.gov/hitech/login.action

- Enter the CMS Registration Number you were given when you first registered

- Click on "Modify"

- As you go through **EACH** page, click "Save & Continue"

- On the appropriate page(s), update your email address

- Click "Submit" on last page

CMS will then update TennCare within 24–48 hours.

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NOVEMBER 2021

Medicaid EPs and EHs should submit questions about the Medicaid Promoting Interoperability (PI) Program (in Tennessee also known as the TennCare EHR Provider Incentive Payment Program) to TennCare.EHRIncentive@tn.gov; including questions about

- Eligibility (first 4 attestation pages)
- Meaningful Use
- Clinical Quality Measures
- Program Participation

ALWAYS include the provider's name and NPI when contacting us. We will respond to your inquiry as quickly as possible.

Should you have issues with a CMS website, contact the QualityNet help desk for assistance at qnetsupport@hcqis.org or 1-866-288-8912.

View TennCare Medicaid EHR Incentive Program online assistance at

- Program website
- How-to PowerPoint Presentations
- FAQs
- Acronyms & Glossary
- Previous issues of EHR Incentive News

TennCare E-Newsletters: If you choose to unsubscribe from this list at any time, you may do so by sending a message to: listserv@listserv.tn.gov, (no subject) and unsubscribe MedicaidHIT. You will receive an email confirming your removal.

Reminder: TennCare EHR Program Sunsets Dec. 31

TennCare's EHR Provider Incentive Payment Program is coming to an end. Per CMS Rules and Regulations, the last incentive payment must go out the door no later than Dec. 31, 2021.

So, what does all this mean to you? The TennCare EHR Provider Incentive Payment Program **will end** December 31, 2021, **EXCEPT** for audits, adjustments, and appeals (relating to audits & adjustments). Providers will no longer submit Meaningful Use (MU) data through attestations to the Division of TennCare. At present TennCare does not anticipate requiring further

reporting of MU by providers. Of course, CMS could change that at any time.

However, TennCare providers who are Medicare providers ARE required by CMS to continue MU reporting to Medicare of medical services rendered to Medicare beneficiaries. Providers should continue to monitor information from CMS regarding the requirements and timing of reporting.

While the introduction of certified Electronic Health Record technology (CEHRT) initially met some resistance, it is TennCare's hope that providers found that CEHRT enhanced their practices

and the care of their patients. The goals of the Medicaid EHR incentive program include better coordination of patient care to improve health outcomes and the sharing of information to improve health care quality, efficiency, and patient safety.

Many Tennessee citizens will also benefit. The hospitals and medical professionals who adopted a CEHRT are now equipped to provide their patients with a "traveling" record of their health picture, should they need it, when they need it.